

CONSTRUCTION PERMIT OFFICE OF AIR MANAGEMENT

**Dylan Designs
2950 Gateway Drive
Elkhart, IN 46514**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: CP 039-11000-00519	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Malfunction Report**

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary fiberglass components manufacturing plant

Authorized Individual: Mike Stankovich
Source Address: 2950 Gateway Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 936, Elkhart, IN 46515
Phone Number: 219-389-8208
SIC Code: 3089
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One fiberglass coating operation consisting of the following:
 - (1) Two (2) gel coat booths, identified as Gel-1 and BK-1, with a maximum capacity throughput of 173.0 pounds per hour, using dry filters as overspray control, and exhausting to stacks Gel-1 and BK-1 (Booth BK-1 may be used as a backup chop coat booth), and
 - (2) One (1) chop coat booth, identified as C-1 or BK-1, with a maximum capacity throughput of 500.0 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack C-1 or BK-1,
- (b) One (1) woodworking operation, identified as Wood, with a maximum capacity throughput of 50.0 pounds per hour of resin, using dry filters as overspray control,
- (c) Natural gas-fired combustion sources with heat input equal to or less than 10 million British Thermal Units (mmBtu) per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 First Time Operation Permit [326 IAC 2-1-4]

That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees)
- (e) Pursuant to 326 IAC 2-7-4 and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months after the source becomes subject to Title V. This 12-month period starts at the postmarked submission date of the Affidavit of

Construction. If the construction is completed in phases, the 12-month period starts at the postmarked submission date of the Affidavit of Construction that triggers the Title V applicability. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Source Modification [326 IAC 2-7-10.5]

- (a) The Permittee must comply with the requirements of [326 IAC 2-7-10.5] whenever the Permittee seeks to construct new emissions units, modify existing emissions units, or otherwise modify the source.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
 - (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;

- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

- (1) Two (2) gel coat booths, identified as Gel-1 and BK-1, with a maximum capacity throughput of 173.0 pounds per hour, using dry filters as overspray control, and exhausting to stacks Gel-1 and BK-1 (Booth BK-1 may be used as a backup chop coat booth), and
- (2) One (1) chop coat booth, identified as C-1 or BK-1, with a maximum capacity throughput of 500.0 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack C-1 or BK-1.

Emission Limitations and Standards

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 8-1-6]

Pursuant to the presumptive MACT determination under 326 IAC 2-4.1-1 and the presumptive BACT under 326 IAC 8-1-6, operating conditions for booths Gel-1, BK-1 and C-1 shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:

- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
- (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(b) above, elsewhere in the process.

(d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 8-1-6, the gel and chop spray booths Gel-1, BK-1 and C-1 are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for the gel and chop spray booths Gel-1, BK-1 and C-1 shall be satisfied by complying with the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.1.1. Compliance with this condition and Condition D.1.1 shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to this source.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates for the gel and chop spray booths Gel-1, BK-1 and C-1 are as follows:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM compliance with the HAP limit specified in Condition D.1.1 and the VOC limit specified in condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC)

Compliance with the HAP content and usage limitation contained in Condition D.1.1 and the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel and chop spray booths Gel-1, BK-1 and C-1 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel and chop spray booth stacks Gel-1, BK-1 and C-1 while one or more of the guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.10 Visible Emissions Notations

- (a) Daily visible emission notations of the gel and chop spray booth stacks Gel-1, BK-1 and C-1 exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the volatile organic HAP emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month. The total volatile organic HAP emissions recorded each month shall reflect the total VOC use for that month.
- (b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the gel and chop spray booth stacks Gel-1, BK-1 and C-1 exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
Monthly Report**

Company Name: Dylan Designs
Location: 2950 Gateway Drive, Elkhart, IN 46514
Permit No.: 039-11000-00519
Source: gel and chop spray booths Gel-1, BK-1 and C-1
Pollutant: Volatile Organic HAP
Limit: Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats (calculated by using emission factors obtained from referenced approved by IDEM, OAM) only shall be less than 100 tons, per twelve (12) consecutive months.

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES ? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Dylan Designs PHONE NO. (219) 389-8208
LOCATION: (CITY AND COUNTY) Elkhart, IN, Elkhart County
PERMIT NO. CP 039-11000-00519 AFS PLANT ID: 039-00519 AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Construction Permit

Source Background and Description

Source Name: Dylan Designs
Source Location: 2950 Gateway Drive, Elkhart, IN 46514
County: Elkhart
SIC Code: 3089
Operation Permit No.: 039-11000-00519
Permit Reviewer: Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed an application from Dylan Designs relating to the construction and operation of a modification to a fiberglass components manufacturing plant.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) One fiberglass coating operation consisting of the following:
 - (1) Two (2) gel coat booths, identified as Gel-1 and BK-1, with a maximum capacity throughput of 173.0 pounds per hour, using dry filters as overspray control, and exhausting to stacks Gel-1 and BK-1, and
 - (2) One (1) chop coat booth, identified as C-1, with a maximum capacity throughput of 500.0 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack C-1,
- (b) One (1) woodworking operation, identified as Wood, with a maximum capacity throughput of 50.0 pounds per hour of resin, using dry filters as overspray control,
- (c) Natural gas-fired combustion sources with heat input equal to or less than 10 million British Thermal Units (mmBtu) per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 039-3106-00190, issued on October 27, 1993.

The source has requested that this permit be transferred to the new owner of the source, Dylan Designs. The previous approval is for the same address, 2950 Gateway Drive, Elkhart, IN 46514, as Quality Components, Inc.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Gel-1	Gel Booth	21	3	11,430	Ambient
BK-1	Gel Booth	21	2	5,490	Ambient
C-1	Chop Booth	21	4	22,170	Ambient
GB-1	Grind Booth	21	2	5,490	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 24, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	399.78
PM-10	399.78
SO ₂	0.00
VOC	50.56
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Styrene	greater than 10
Methyl Methacrylate	greater than 10
Dimethyl Phthalate	less than 10
MEK	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of least one regulated pollutant is equal to or greater than 100 tons per year, the potential to emit any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the construction permit 039-3106-00190, issued on October 27, 1993 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	24.60
CO	0.00
NO _x	0.00
HAP (Lead)	0.00

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	7.99
PM10	7.99
SO ₂	0.00
VOC	68.37
CO	0.00
NO _x	0.00

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Annual Air Emission Inventory and Emission Statement Facility Report , dated 1995.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	8.06	8.06	0.01	50.56	0.81	0.96
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from the permit **CP 039-3106-00190**, is now subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) at least one of the criteria pollutant is greater than or equal to 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is greater than 10 tons per year, and
- (c) any combination of HAPs is greater than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart W as it mixes and does not manufacture basic liquid epoxy resin or wet strength resins.

- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart U as it does not process Group I Polymers and Resins.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The gel and chop spray booths Gel-1, BK-1 and C-1 have the potential to emit (PTE) greater than 10 tons per year of any HAP and 25 tons per year of any combination of HAPs, therefore, the source shall comply with 326 IAC 2-4.1-1 (New Source Toxics Control) by accepting the presumptive MACT adopted by OAM for the fiberglass industries. The presumptive MACT adopted by OAM is outlined as follows:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: $\text{Emissions, lb or ton} = M (\text{mass of resin or gel coat used, lb or ton}) * EF$
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
- (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the gel and chop spray booths Gel-1, BK-1 and C-1 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the gel and chop spray booths Gel-1, BK-1 and C-1 is in operation, in order to comply with this limit.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. Pursuant to 326 IAC 8-1-6 the gel and chop spray booths Gel-1, BK-1 and C-1 are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. OAM considers that the presumptive MACT for the fiberglass operation meets the minimum requirements of BACT. Therefore, the source shall also be in compliance with the requirements of BACT by accepting presumptive MACT for these booths.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This proposed modification will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 3 of 5)

Conclusion

The construction and operation of this modification to a fiberglass components manufacturing plant shall be subject to the conditions of the attached proposed **Construction Permit 039-11000-00519**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Dylan Designs
Source Location: 2950 Gateway Drive, Elkhart, IN 46514
County: Elkhart
Operation Permit No.: 039-11000-00519
SIC Code: 3089
Permit Reviewer: Phillip Ritz/EVP

On July 26, 1999, the Office of Air Management (OAM) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Dylan Designs had applied for a construction permit to construct and operate a stationary fiberglass components manufacturing plant. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 19, 1999, Ray Romberger, on behalf of Dylan Designs, submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

Comment

Dylan Designs would like to be able to use Booth BK1 as a backup for Gel operations or Chop operations.

Response

The unit descriptions in Section A.2 and Section D.1 in the permit will be changed to clarify that the backup booth can be used for either Gel operations or Chop operations. This change will not modify the source's potential to emit, due to the limitation in Condition D.1.1. The changes to the permit are as follows:

- (a) One fiberglass coating operation consisting of the following:
 - (1) Two (2) gel coat booths, identified as Gel-1 and BK-1, with a maximum capacity throughput of 173.0 pounds per hour, using dry filters as overspray control, and exhausting to stacks Gel-1 and BK-1 (**Booth BK-1 may be used as a backup chop coat booth**), and

The changes to Condition D.1.1 (New Source Toxics Control) in the permit are as follows:

Pursuant to the presumptive MACT determination under 326 IAC 2-4.1-1 and the presumptive BACT under 326 IAC 8-1-6, operating conditions for booths Gel-1, **BK-1** and C-1 shall be the following:

The unit description on page 1 of 8 of the TSD has also been revised. The changes to the TSD are as follows:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

- (a) One fiberglass coating operation consisting of the following:
 - (1) Two (2) gel coat booths, identified as Gel-1 and BK-1, with a maximum capacity throughput of 173.0 pounds per hour, using dry filters as overspray control, and exhausting to stacks Gel-1 and BK-1 (**Booth BK-1 may be used as a backup chop coat booth**), and

Appendix A: Emission Calculations

Company Name: Dylan Designs
Address City IN Zip: 2950 Gateway Drive, Elkhart, IN 46514
CP: 039-11000
Plt ID: 039-00519
Reviewer: Phillip Ritz/EVP
Date: May 24, 1999

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Fiberglass Coating Operation	Natural Gas Combustion	TOTAL
PM	399.71	0.07	399.78
PM10	399.71	0.07	399.78
SO2	0.00	0.01	0.01
NOx	0.00	0.96	0.96
VOC	50.51	0.05	50.56
CO	0.00	0.81	0.81
total HAPs	68.75	0.00	68.75
worst case single HAP	40.43 Styrene	0.00	40.43 Styrene
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Fiberglass Coating Operation	Natural Gas Combustion	TOTAL
PM	7.99	0.07	8.06
PM10	7.99	0.07	8.06
SO2	0.00	0.01	0.01
NOx	0.00	0.96	0.96
VOC	50.51	0.05	50.56
CO	0.00	0.81	0.81
total HAPs	68.75	0.00	68.75
worst case single HAP	40.43 Styrene	0.00	40.43 Styrene
Total emissions based on rated capacity at 8,760 hours/year, after control.			

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 2 of 5 TSD App A

Company Name: Dylan Designs
Address City IN Zip: 2950 Gateway Drive, Elkhart, IN 46514
CP: 039-11000
Pit ID: 039-00519
Reviewer: Phillip Ritz/EVP
Date: May 24, 1999

Material	Process or Booth I.D.	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	% Resin Weight Emitted (CFA Emission Models)	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (tons/yr)	lb VOC/gal solids	Transfer Efficiency
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	1.93000	0.038	0.09	0.09	0.01	0.15	0.03	0.50	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	0.75100	0.038	0.09	0.09	0.00	0.06	0.01	0.20	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	0.42900	4.320	0.09	0.09	0.16	3.84	0.70	12.58	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	0.75000	5.800	0.09	0.09	0.38	9.02	1.65	29.52	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	13.90000	0.106	0.09	0.09	0.13	3.05	0.56	10.00	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	7.50000	0.240	0.09	0.09	0.16	3.73	0.68	12.22	4.80	75%
Resin-CoRezyn	C-1	9.3	33.50%	0.0%	33.5%	2.77%	0.0%	65.00%	14.50000	3.000	0.09	0.09	3.76	90.16	16.45	295.22	4.80	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	0.55700	0.038	0.46	0.46	0.01	0.24	0.04	0.17	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	0.55700	0.038	0.46	0.46	0.01	0.24	0.04	0.17	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	0.55700	0.038	0.46	0.46	0.01	0.24	0.04	0.17	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	0.18600	5.800	0.46	0.46	0.50	11.91	2.17	8.31	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	0.04640	4.320	0.46	0.46	0.09	2.21	0.40	1.54	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	2.79000	0.106	0.46	0.46	0.14	3.26	0.60	2.28	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	2.32000	0.240	0.46	0.46	0.26	6.15	1.12	4.29	5.74	75%
Gel coat-DCI White	Gel-1	10.8	34.65%	0.0%	34.7%	12.33%	0.0%	65.00%	4.50000	3.000	0.46	0.46	6.21	149.03	27.20	104.04	5.74	75%
Resin-Stypol	Fugitive	9.0	46.92%	0.0%	46.9%	3.39%	0.0%	53.00%	3.60000	0.019	0.14	0.14	0.01	0.24	0.04	0.36	7.95	75%
Tool Gel-Red Tooling	Fugitive	9.2	44.84%	0.0%	44.8%	23.43%	0.0%	55.00%	0.87200	0.019	0.96	0.96	0.02	0.39	0.07	0.09	7.48	75%
Mek Peroxide	C-1 Gel-1 Fugitive	9.3	100.00%	0.0%	100.0%	100.00%	0.0%	0.00%	0.01220	13.560	9.30	9.30	1.54	36.92	6.74	0.00	FRR	75%
State Potential Emissions												Add worst case coating to all solvents		11.53	276.74	50.51	399.71	

Federal Potential Emissions (controlled):

Limit Usage: PM	Limit Usage: VOC	Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
0.00%	0.00%	0.00%	98.00%	11.53	276.74	50.51	7.99

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics * % Resin Weight Emitted (CFA Emission Model)) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics * % Resin Weight Emitted (CFA Emission Model))
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Page 3 of 5 TSD AppA

Company Name: Dylan Designs
Address City IN Zip: 2950 Gateway Drive, Elkhart, IN 46514
CP: 039-11000
Pit ID: 039-00519
Reviewer: Phillip Ritz/EVP
Date: May 24, 1999

Material	Process or Booth I.D.	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Styrene	% Resin Weight Emitted (CFA Emission Models)	Weight % Methyl Methacrylate	Weight % Dimethyl Phthalate	Weight % MEK	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Styrene Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	MEK Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Resin-CoRezyn	C-1	9.3	1.93000	0.038	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	0.75100	0.038	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	0.42900	4.320	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.69	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	0.75000	5.800	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.62	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	13.90000	0.106	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.55	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	7.50000	0.240	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.67	0.00	0.00	0.00	0.00	0.00	0.00
Resin-CoRezyn	C-1	9.3	14.50000	3.000	33.00%	2.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.21	0.00	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	0.55700	0.038	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.04	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	0.55700	0.038	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.04	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	0.55700	0.038	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.04	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	0.18600	5.800	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.93	2.04	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	0.04640	4.320	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.36	0.38	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	2.79000	0.106	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.53	0.56	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	2.32000	0.240	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.99	1.05	0.00	0.00	0.00	0.00	0.00
Gel coat-DCI White	Gel-1	10.8	4.50000	3.000	30.72%	12.33%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.11	25.47	0.00	0.00	0.00	0.00	0.00
Resin-Stypol	Fugitive	9.0	3.60000	0.019	46.92%	3.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.00	0.00	0.00	0.00	0.00	0.00
Tool Gel-Red Tooling	Fugitive	9.2	0.87200	0.019	41.44%	23.43%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07	0.01	0.00	0.00	0.00	0.00	0.00
Mek Peroxide	C-1 Gel-1 Futigitive	9.3	0.01220	13.560	0.00%	100.00%	0.00%	40.00%	2.00%	0.00%	0.00%	0.00%	0.00	0.00	2.70	0.13	0.00	0.00	0.00
													40.43	25.49	2.70	0.13	0.00	0.00	0.00

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Styrene emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP *% Resin Weight Emitted (CFA Emission Models)* 8760 hrs/yr * 1 ton/2000 lbs

68.75

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: Dylan Designs
Address City IN Zip: 2950 Gateway Drive, Elkhart, IN 46514
CP: 039-11000
Pit ID: 039-00519
Reviewer: Phillip Ritz/EVP
Date: May 24, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.2

19.2

Heat Input Capacity includes:

one (1) air make up unit with a rated heat input of 0.99 mmBtu per hour, identified as AM-1

six (6) tube heaters each with a rated heat input of 0.2 mmBtu per hour (1.2 mmBtu per hour total), identified as H-1 through H-6

	Pollutant					
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.07	0.07	0.01	0.96	0.05	0.81

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 er

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Company Name: Dylan Designs
Address City IN Zip: 2950 Gateway Drive, Elkhart, IN 46514
CP: 039-11000
Plt ID: 039-00519
Reviewer: Phillip Ritz/EVP
Date: May 24, 1999

Material	Emissions (tons/yr)	Emissions (g/s)	Modeled Conc. @ 1 g/s (ug/m ³)	Actual Modeled Concentration (mg/m ³)	OSHA PEL (mg/m ³)	%of PEL
Styrene	40.43	1.16E+00	391	4.55E-01	428	0.11 %
Methyl Methacrylate	25.49	7.33E-01	391	2.87E-01	410	0.07 %
Dimethyl Phthalate	2.70	7.75E-02	391	3.03E-02	5	0.61 %
MEK	0.13	3.88E-03	391	1.52E-03	590	0.00 %